

EXHIBIT 2

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)
)

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VIDEOTAPED DEPOSITION OF DANIEL CHU

San Francisco, California

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Volume I

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2583707

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1 prepared before it went to senior management; would
2 that be fair?

3 MS. BAILY: Object to form.

4 THE WITNESS: That's fair, yes.

5 BY MR. GONZALEZ: 10:18:33

6 Q You don't recall making any edit to the big
7 headline that said "A single player will likely earn
8 majority of profits"? You -- you did not change
9 that in any way, did you?

10 MS. BAILY: Object to form. 10:18:43

11 THE WITNESS: I don't remember, honestly.

12 But I think it's important context to know that many
13 of these documents are intended to provoke
14 conversation and thought, not necessarily saying
15 this is the answer. 10:18:52

16 BY MR. GONZALEZ:

17 Q Fair enough.

18 Then if you turn to the next page, it says
19 that [REDACTED]

20 "Creating a global goliath." 10:19:04

21 Do you see that?

22 A I do.

23 Q What does that mean? Is that global
24 Goliath Waymo?

25 A This slide is referring to -- to Uber. 10:19:12